

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

CONTENTGUARD HOLDINGS, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
AMAZON.COM, INC.; APPLE INC.;	)	
BLACKBERRY LIMITED (FKA RESEARCH	)	
IN MOTION LIMITED) AND BLACKBERRY	)	No. 2:13-cv-01112 (JRG)
CORPORATION (FKA RESEARCH IN	)	
MOTION CORPORATION); HTC	)	JURY TRIAL DEMANDED
CORPORATION AND HTC AMERICA, INC.;	)	
HUAWEI TECHNOLOGIES CO., LTD. AND	)	
HUAWEI DEVICE USA, INC.; MOTOROLA	)	
MOBILITY LLC; SAMSUNG ELECTRONICS	)	
CO., LTD., SAMSUNG ELECTRONICS	)	
AMERICA, INC., and SAMSUNG	)	
TELECOMMUNICATIONS AMERICA, LLC,	)	
	)	
Defendants.	)	

**THIRD NOTICE OF COMPLIANCE WITH THIRD-PARTY  
PRODUCTION PROVISIONS BY DEFENDANT AMAZON.COM, INC.**

Pursuant to Paragraph 12 of the Amended Protective Order, Defendant Amazon.com, Inc. files this notice that it produced third-party confidential information and verifies as follows:

1. Buena Vista Video on Demand: Amazon notified Buena Vista of its intent to produce a Buena Vista confidential document by letter dated August 29, 2014, sent via FedEx. The letter informed Buena Vista of the specific item to be produced and included the Amended Protective Order. Buena Vista has not contacted Amazon to discuss any objections to the production.

2. Twentieth Century Fox: Amazon notified Fox of its intent to produce a Fox confidential document by letter dated September 2, 2014, sent via FedEx. The letter informed Fox

of the specific item to be produced and included the Amended Protective Order. On September 24, 2014, in-house counsel for Fox contacted counsel for Amazon. In-house counsel for Fox and counsel for Amazon also exchanged a series of e-mails on September 26, 29, and 30, 2014. Fox did not object to the production of the confidential document under the confidentiality designation “Outside Attorneys’ Eyes Only” with a few redactions of irrelevant commercially sensitive information.

3. HBO Video: Amazon notified HBO of its intent to produce an HBO confidential document by letter dated September 2, 2014, sent via FedEx. The letter informed HBO of the specific item to be produced and included the Amended Protective Order. On September 3, 2014, an in-house attorney from HBO contacted counsel for Amazon. In-house counsel for HBO and counsel for Amazon also exchanged a series of e-mails on September 15 and 16, 2014. HBO did not object to the production of the confidential document under the confidentiality designation “Outside Attorneys’ Eyes Only” with a few redactions of irrelevant commercially sensitive information.

4. NBCUniversal: Amazon notified NBCUniversal of its intent to produce an NBCUniversal confidential document by letter dated August 29, 2014, sent via FedEx. The letter informed NBCUniversal of the specific item to be produced and included the Amended Protective Order. On September 4, 2014, an in-house attorney from NBCUniversal contacted counsel for Amazon. In-house counsel for NBCUniversal and counsel for Amazon also exchanged a series of e-mails on September 8 and 9, 2014. NBCUniversal did not object to the production of the confidential document under the confidentiality designation “Outside Attorneys’ Eyes Only” with a few redactions of irrelevant commercially sensitive information.

5. Warner Bros. Digital Distribution: Amazon notified Warner Bros. of its intent to produce a Warner Bros. confidential document by letter dated August 29, 2014, sent via FedEx. The letter informed Warner Bros. of the specific item to be produced and included the Amended Protective Order. Warner Bros. has not contacted Amazon to discuss any objections to the production.

Respectfully submitted,

/s/ Jennifer H. Doan

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**COUNSEL FOR DEFENDANT  
AMAZON.COM, INC.**

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic service on October 16, 2014. *See* Local Rule CV-5(a)(3)(A).

/s/ Jennifer H. Doan

Jennifer H. Doan